

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

---

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No: 08-35653-KRH
	:	
Debtors	:	(Jointly Administered)
	:	
	:	

---

**MOTION TO ADMIT PRO HAC VICE**

Neil E. McCullagh, Esquire moves this Court for an Order permitting Eric J. Fromme, Esquire (“Mr. Fromme”) from the law firm of Rutan & Tucker, LLP to appear and represent Raymond & Main Retail, LLC (“Raymond & Main”) *pro hac vice* in the above-styled bankruptcy cases and any related adversary litigation, and in support of his Motion, states as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Mr. Fromme in this matter. My business address and bar number are as follows:

Neil E. McCullagh (VSB #39027)  
Spotts Fain PC  
411 E. Franklin Street, Suite 600  
Richmond, VA 23219

2. Mr. Fromme is a member in good standing of the Bar of the State of California, the state of his residence, and is admitted to practice before the United States District Courts for

Eric J. Fromme, (Bar #193517)  
Rutan & Tucker, LLP  
611 Anton Boulevard, 14<sup>th</sup> Floor  
Costa Mesa, California 92626  
Phone: (714) 641-5100  
Facsimile: (714) 546-9035

*Co-Counsel for Raymond & Main Retail, LLC*

Robert H. Chappell, Esquire (VSB#31698)  
Neil E. McCullagh, Esquire (VSB #39027)  
Jennifer J. West, Esquire (VSB #47522)  
Erin E. Kessel, Esquire (VSB #65360)  
Spotts Fain PC  
411 E. Franklin Street, Suite 600  
Richmond, Virginia 23219  
Phone: (804) 697-2000  
Facsimile: (804) 697-2100

*Co-Counsel for Raymond & Main Retail, LLC*

the Northern, Eastern, Central and Southern Districts of California, the Southern District of Texas, the Ninth Circuit Court of Appeals, the Fifth Circuit Court of Appeals and the United States Supreme Court. His business address is as follows:

Rutan & Tucker, LLP  
611 Anton Boulevard, 14<sup>th</sup> Floor  
Costa Mesa, California 92626

3. Mr. Fromme has not been the subject of disciplinary action by the Bar or courts of the State of California, or any state or any Federal Court.

4. Mr. Fromme has not been denied admission to the courts of any state or to any Federal Court.

5. Mr. Fromme has completed an Application to Qualify As A Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), a copy of which is attached as **Exhibit A.**

WHEREFORE, Neil E. McCullagh, Esquire prays that this Court grant his Motion to permit Eric J. Fromme, Esquire to represent Raymond & Main Retail, LLC *pro hac vice* in this case and for such other and further relief as this Court deems just and proper.

Respectfully submitted this 11<sup>th</sup> day of April, 2011,

/s/ Neil E. McCullagh

Robert H. Chappell, Esquire (VSB #31698)  
Neil E. McCullagh, Esquire (VSB #39027)  
Jennifer J. West, Esquire (VSB #47522)  
Erin E. Kessel, Esquire (VSB #65360)  
Spotts Fain PC  
411 East Franklin Street, Suite 600  
Richmond, Virginia 23219  
Phone: (804) 697-2000  
Facsimile: (804) 697-2100  
*Co-Counsel for Raymond & Main Retail, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11<sup>th</sup> day of April, 2011, a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid and/or electronic means through the Court's ECF system on the following, constituting all necessary parties:

Andrew W. Caine, Esquire  
Victoria Newmark, Esquire  
Pachulski Stang Ziehl & Jones LLP  
10100 Santa Monica Boulevard  
Los Angeles, CA 90067-4100

Lynn L. Tavenner, Esquire  
Paula S. Beran, Esquire  
Tavenner & Beran, PLC  
20 North Eighth Street, 2<sup>nd</sup> Floor  
Richmond, VA 23219

Office of the U.S. Trustee  
Attn: Robert Van Arsdale, Esquire  
701 East Broad Street  
Suite 4304  
Richmond, VA 23219

/s/ Neil E. McCullagh